

June 28, 2018

Ms. Jillian Lane
Greenland Safe Water Action
25 Falls Way
Greenland, NH 03840

Dear Jillian,

Thank you for the opportunity to meet on June 4 with you and other members of Greenland Safe Water Action and your community who are so actively working to respond to, and alleviate, concerns associated with the ongoing remediation at the Coakley Landfill Superfund Site (Coakley Site). Steven Cook, Erin Chancellor, and I were impacted by the passion and dedication you are bringing to this issue. Erin and I were also significantly impacted by the personal experiences that you and your neighbors shared that evening at the community group meeting.

I am grateful we have had the opportunity since June 4 to work together on the PFAS Community Engagement Event on June 25 and 26. That event, concluded just last week, provided several opportunities for Greenland Safe Water Action, and other PFAS affected community groups, to share first hand their experiences and recommendations for action with EPA. EPA confirmed the four specific actions Administrator Pruitt has committed to taking on PFAS in addition to the development of a PFAS National Management Plan. They are:

- EPA will initiate steps to evaluate the need for a maximum contaminant level (MCL) for PFOA and PFOS. We will convene our federal partners and examine everything we know about PFOA and PFOS in drinking water.
- EPA is beginning the necessary steps to propose designating PFOA and PFOS as “hazardous substances” through one of the available statutory mechanisms, including potentially CERCLA Section 102.
- EPA is currently developing groundwater cleanup recommendations for PFOA and PFOS at contaminated sites and will complete this task by fall of this year.
- EPA is taking action in close collaboration with our federal and state partners to develop toxicity values for GenX and PFBS.

At our June 4 meeting, you presented EPA with a petition signed by 135 concerned New Hampshire residents which outlined action that you would like EPA to take at the Coakley site. We have been working cooperatively with the New Hampshire Department of Environmental Services (NHDES) to implement actions that will hopefully respond directly to the concerns of the community.

Below is a summary of the actions you have requested and EPA’s current response. Some of the responses will require further updates as we continue to work toward our mutual goals. Four of your requests ask EPA to compel the Coakley Landfill Group (CLG) to take

certain actions. As a general rule, EPA does not comment on enforcement. But, I can share that EPA remains in regular contact with the CLG as part of our oversight of the Consent Decrees.

- 1. Provide all impacted residents access to safe, abundant water, and not just newly developed properties.*

We understand that the community is not comfortable with EPA's 70 ppt health advisory for PFOA and PFOS, separately and combined, in drinking water. However, EPA currently takes that advisory seriously and wants to ensure no residents are drinking water above that standard. We heard concerns from your neighbors regarding the lack of sampling at some residential wells and EPA agrees that this is something that should and can be addressed. EPA is working with NHDES to review the current residential well sampling program and to put together resources to expand sampling for those additional residents that have requested sampling to be initiated before the end of the summer. If sampling indicates that drinking water wells *are identified above the health advisory level*, EPA will evaluate the risk and take steps to address those risks.

- 2. Install an effective remediation system at the Coakley Landfill Superfund site. The current plan for monitored natural attenuation was set in place before the discovery of PFAS and 1,4 dioxane, and now we need a real strategy to keep us safe.*

The ongoing collection of groundwater, private well water, surface water, sediment, and fish tissue data will be necessary to determine if a change to the remedy is required, and, if so, what an effective change might look like. The deep bedrock investigation is underway to determine if there is a potential pathway for contaminants to migrate from the site to the private residential wells that are screened in bedrock. Drilling of new bedrock wells has commenced and surveying and sampling of those wells will occur once drilling is complete. The CLG has also recently collected fish samples, including brown trout, at four locations in Berrys Brook that will be analyzed for PFAS. Surface water and sediment samples continue to be collected semi-annually. Finally, EPA is in discussions with the CLG regarding further work that is necessary to determine the impact from the discharge of contaminated groundwater into Berrys Brook. Through all of these enhanced sampling efforts, EPA and NHDES are continuously monitoring any changes in conditions at the Site.

- 3. Ensure that the PFAS maximum contaminant level (MCL) that the EPA committed to at its PFAS Leadership Summit in May is as strong as possible. The MCL should be significantly lower than the EPA's current 70 ppt advisory limit and include all of the chemicals in the PFAS family.*

As noted above, and committed to by Administrator Pruitt at the PFAS summit in Washington, EPA is committed to evaluating the need for a MCL for PFOA and PFOS. EPA will convene our federal partners and examine everything we know about PFOA and PFOS in drinking water. As part of this evaluation, EPA will be reviewing all newly available scientific information, including the recently released ATSDR toxicological profile.

- 4. Expand residential well testing to every home in a pathway determined through collaboration with USGS, with tests performed by an independent body. We need to know how much PFAS is in our water.*

As stated above, EPA is working with NHDES to expand residential well testing for those residents that have asked for testing. In addition, EPA has reached out to the United States Geological Survey (USGS) to develop a plan that will help refine the regional bedrock model to focus on the specific conditions around the Coakley site.

5. *Install and maintain filters at every home within 2 miles that requests them, and at nearby schools. We need filters to be able to trust the water that comes out of our tap, both in our homes and our schools.*

To date no residential wells that have been sampled have had PFOA or PFOS above the EPA's lifetime health advisory level of 70 ppt, and all results have been below the 40 ppt screening level. Over 80 wells have been sampled for PFAS, and 20 wells have been sampled four times since 2016. However, as stated above, if new investigations indicate that residents or school children may be exposed to levels above the health advisory, EPA will evaluate the risk and take steps to abate those risks which may include filters for drinking water.

Thank you again Jillian for your thoughtful involvement on this issue, and as always, please feel free to contact Skip Hull or Jim Murphy of the Coakley team with any questions you may have. We will certainly keep you posted as we progress forward at the site.

Regards,

Alexandra Dapolito Dunn
Regional Administrator

cc: Steven Cook, Deputy Assistant Administrator, EPA Office of Land and Emergency Management
Erin Chancellor, Counsel to the Administrator, EPA